



A division of the West Liberty Telephone Company

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www.libertycommunications.com

■ Telephone service

■ Lcom.net

■ Megaband

■ Long distance

■ Voice mail

■ System design

■ Installation & maintenance

■ Digital TV

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Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date Filed: January 28, 2009

Name of Company covered by this certification: Liberty Communications

Form 499 Filer ID: 801069

Name of signatory: Jerry Melick

Title of signatory: President

I, Jerry Melick, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions against data brokers in the past year. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

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Statement of Compliance with CPNI

(a) Telecommunications carriers must implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

Liberty Communication's billing system provides for compliance with this section. A CPNI box pops up on the screen anytime an account is pulled up and is readily accessible to all personnel. CPNI data is one of two types. Customers that have verbally required that Liberty Communications not use CPNI data for marketing purposes have a check mark populated in the CPNI field and the date they opted out populated in the date field. Customers that have not opted out have nothing populated in the CPNI field or the CPNI date field. The status of the CPNI field is clearly visible and available for each customer account.

In addition, during the process of establishing a subscriber list for a marketing campaign, an electronic request is made to pull only those with CPNI data of "blank" into the list. This process ensures we do not use CPNI data to market to customers that have opted not to allow Liberty Communications to do so.

(b) Telecommunications carriers must train their personnel as to when they are and are not authorized to use CPNI, and carriers must have an express disciplinary process in place.

All Liberty Communication's employees have been trained on the appropriate use of and protection of CPNI. Protection and proper use of CPNI is a Company Policy and any inappropriate use is considered a violation of such policy and subject to Corrective Action outlined in the Employee Handbook under the section "Disciplinary Policy and Procedures". Training on the new CPNI rules was conducted between 11/30/07 and 12/6/07 and the annual refresher training occurred on 12/10/2008.

(c) All carriers shall maintain a record, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. All carriers shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Carriers shall retain the record for a minimum of one year.

Campaign Data complying with this requirement is stored electronically and kept on file for a minimum of one year.

(d) Telecommunications carriers must establish a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintain records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

Liberty Communications' General Manager currently acts as Compliance Manager and provides approval for all marketing campaigns.

(e) A telecommunications carrier must have an officer, as an agent of the carrier, sign a compliance certificate on an annual basis stating that the officer has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certificate explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart.

Liberty Communications' General Manager has been designated as the Compliance Officer. Liberty Communications has had no reason to take action against data brokers in 2008 and received zero complaints of unauthorized release of CPNI during the 2008 calendar year.

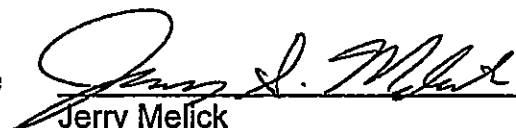
(f) Carriers must provide written notice within five business days to the Commission of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

(1) The notice shall be in the form of a letter, and shall include the carrier's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.

(2) Such notice must be submitted even if the carrier offers other methods by which consumers may opt-out.

Liberty Communications has not experienced any problems with the opt-out mechanisms in place. In the event that such an outage occurs Liberty Communications understands it's obligation to report the outage within 5 business days.

Signature


Jerry Melick
President

Date 1/28/09

Liberty Communications
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CPNI Record:
Marketing Campaigns

Campaign Name	Campaign Date	Description	CPNI data used	Products Offered	CPNI Approved By	Date
Easy Pay	1/14/08 - 2/15/08	Direct mail letter to all Lcom customers with Pay at Bank w/out an email bill.	Easy Pay customers w/out email bill that are current Lcom Internet customers.	Easy Pay with email bill.	Jerry Melick	1/9/2008
Spring DSL Campaign	4/1/08 - 5/31/08	Waive modem and activation fees for any customer that signs up for High Speed Internet	All phone customers without a DSL USC charge on their bill.	Megaband Lite, 512k, 1.5M, 3M	Jerry Melick	3/24/2008
Fall DSL Campaign	8/18/08 - 10/31/08	Direct mail flyer to existing phone customers that do not currently subscribe to DSL service. Waiving modem and activation fees and offering a \$50 credit on first bill for all new High Speed subscribers.	All phone customers without a DSL USC charge on their bill.	Megaband Lite, 512k, 1.5M, 3M	Jerry Melick	8/11/2008
Easy Pay	10/20/08 - 12/31/08	Direct mail letter to all Internet customers that do not currently have Easy Pay.	All Internet customers without Easy Pay.	Easy Pay with email bill.	Jerry Melick	10/16/2008
4Q Premium Promotion	11/17/08 - 12/31/08	Bill message to existing DTV customers that do not currently subscribe to a premium package. Offer: sign up for a premium movie package and the first month is free.	Existing DTV customers that do not currently subscribe to a premium movie package.	HBO, Cinemax, Starz and Encore and Showtime	Jerry Melick	11/17/2008

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CPNI Breach Tracking

Breach Discovery	USSS/FBI	Customer/Public		
Date	Notification Date	Notification	Description of CPNI breached	Circumstances of Breach

During the year 2008 we had no CPNI breaches.

Liberty Communications
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CPNI Opt-Out Campaign

Mail Date	# of Cards Mailed	Mailing Cost	Expiration Date of 30 day wait period
9/23/2005	3308	\$657.03	10/25/2005
8/31/2007	3218	\$705.28	10/3/2007

Annual Privacy Notice – CPNI Approval Campaign

Your privacy matters to us. We pledge to protect your privacy and keep your trust. We respect your right to keep your personal information private. As Liberty Communications provides products and services to you, we gather information about the quality, technical configuration, type, destination, and amount of products and services you use. We also gather data during application processes. This information is known as **Customer Proprietary Network Information (CPNI)** and “Non public Personal Information”.

Under federal law, you have a right and Liberty Communications has a duty, to protect the confidentiality of your CPNI. Liberty Communications will not disclose or sell this information, unless required to do so by operation of law; or upon receipt of an affirmative written request by a customer. Liberty Communications may share or permit access to your CPNI on a limited, as-needed basis with trusted agents and contractors that assist us in providing you with communications related services. Agents and contractors share a concomitant duty to protect your CPNI. Know that we limit access to your personal information to those employees and other third parties or contractors who must use the information to provide products and services to you. Further sharing of this information is restricted by our employee handbook, non-disclosure agreements and the law, in order to guard your personal information.

Liberty Communications may use such information in order to identify and present services to which you currently do not subscribe. If you prefer that Liberty Communications not use CPNI for this purpose, you may opt-out by calling 319-627-2145. Your decision to opt-out will not have any impact on your current Liberty Communications services, but may impact our ability to provide information on new products and services. If we don't hear from you we'll assume that you grant us permission to use CPNI in order to identify and present additional products and services that may be of benefit. Your decision is valid until you decide to change it. At any time, you may opt-out or revoke your previous decision to opt-out by calling the number listed in this paragraph.

Customer Proprietary Network Information

As Liberty Communications provides products and services to you, Liberty Communications develops information about the quality, technical configuration, type, destination, amount of products and services you use, and other information found on your bill ("Customer Proprietary Network Information, also known as CPNI"). Under federal law, you have a right and Liberty Communications has a duty, to protect the confidentiality of your CPNI. To serve you in the most effective and efficient manner, Liberty Communications may use your CPNI for purposes of determining and offering other products and services that may interest you. Liberty Communications may also disclose, share or permit access to your CPNI on a limited, as-needed basis with trusted agents and contractors that assist us in providing you with communications related services. Agents and contractors share a concomitant duty to protect your CPNI. Liberty will not disclose or sell CPNI to third parties, unless otherwise required to do so by operation of law.

However, if you so desire, Liberty Communications will not use or share with others your CPNI to offer products and services that are unrelated to the Services you currently receive from us. Examples of such services include Internet or Digital TV service. If you would prefer that Liberty Communications not use your CPNI for this purpose, you may opt-out by calling 319-627-2145. Liberty Communications will not use your information for 33 days after mailing this notice to give you time to make your choice. Your decision to opt-out will not have any impact on your current Liberty Communications services. Also your decision on whether or not to opt-out is valid until you decide to change it. As such you may, at any time, opt-out or revoke your previous decision to opt-out by calling the number listed in this paragraph.